

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF WILLIAM
MCGINTY IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS MOTION TO STAY
PRELIMINARY INJUNCTION
PENDING APPEAL

NOTE ON MOTION CALENDAR:
August 25, 2025

I, William McGinty, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing the Plaintiff State of Washington in the above-captioned matter.

2. Attached as **Exhibit 1** is a true and correct copy of a memorandum titled "Preventing the Mutilation of American Children" issued by Attorney General Pam Bondi on April 22, 2025, available at URL: <https://www.justice.gov/ag/media/1402396/dl>.

3. Attached as **Exhibit 2** is a true and correct copy of a memorandum titled "Civil Division Enforcement Priorities" issued by Assistant Attorney General Brett A. Shumate on June 11, 2025, available at URL: <https://www.justice.gov/civil/media/1404046/dl?inline>.

4. Attached as **Exhibit 3** is a true and correct copy of a letter from Drew Snyder on behalf of the Centers for Medicare and Medicaid Services (CMS) to directors of State Medicaid

1 agencies, dated April 11, 2025, available at URL: [https://www.cms.gov/files/document/letter-](https://www.cms.gov/files/document/letter-stm.pdf)
 2 [stm.pdf](https://www.cms.gov/files/document/letter-stm.pdf).

3 5. Attached as **Exhibit 4** is a true and correct copy of a letter from the Secretary of
 4 the Department of Health and Human Services Robert F. Kennedy Jr. to health care providers,
 5 health risk managers, and state medical boards, including in the Plaintiff States, dated May 28,
 6 2025. The letter was also posted publicly on the social media platform “X” available at
 7 URL: <https://x.com/HHSGov/status/1927791449476567043>.

8 6. Attached as **Exhibit 5** is a true and correct copy of a letter from the Director of
 9 the Centers for Medicare and Medicaid Services, Dr. Mehmet Oz, to health care providers
 10 throughout the United States, including the Plaintiff States, dated May 28, 2025, available at
 11 URL: <https://www.cms.gov/files/document/hospital-oversight-letter-generic.pdf>.

12 7. Attached as **Exhibit 6** is a true and correct copy of the Department of Health and
 13 Human Services’ webpage titled “Guidance for Whistleblowers on the Chemical and Surgical
 14 Mutilation of Children.” This was printed from URL: [https://www.hhs.gov/protect-](https://www.hhs.gov/protect-kids/whistleblower-guidance/index.html)
 15 [kids/whistleblower-guidance/index.html](https://www.hhs.gov/protect-kids/whistleblower-guidance/index.html) on August 5, 2025.

16 8. Attached as **Exhibit 7** is a true and correct copy of a post on the social media
 17 platform “X” by the Federal Bureau of Investigation’s official account on June 2, 2025. This was
 18 printed from URL: <https://x.com/FBI/status/1929587710894739567> on August 14, 2025.

19 9. Attached as **Exhibit 8** is a true and correct copy of a press release issued
 20 July 9, 2025 by the Department of Justice titled “Department of Justice Subpoenas Doctors and
 21 Clinics Involved in Performing Transgender Medical Procedures on Children”, available at
 22 URL: [https://www.justice.gov/opa/pr/departments-justice-subpoenas-doctors-and-clinics-involv-](https://www.justice.gov/opa/pr/departments-justice-subpoenas-doctors-and-clinics-involved-performing-transgender-medical)
 23 [ed-performing-transgender-medical](https://www.justice.gov/opa/pr/departments-justice-subpoenas-doctors-and-clinics-involved-performing-transgender-medical).

24 10. Attached as **Exhibit 9** is a true and correct copy of a subpoena that was filed on
 25 the docket in *In Re: Subpoena No. 25-1431-014*, No. 2:25-mc-00039-MAK (D. Penn.
 26 July 8, 2025).

11. Attached as **Exhibit 10** is a true and correct copy of an article issued by The White House titled “President Trump Promised to End Child Sexual Mutilation—and he Delivered.” This was printed from URL: <https://www.whitehouse.gov/articles/2025/07/president-trump-promised-to-end-child-sexual-mutilation-and-he-delivered/> on August 5, 2025.

12. Attached as **Exhibit 11** is a true and correct copy of a document I received from a current National Institutes of Health employee titled “Notice of Update to NIH Policies and Practices to Implement Executive Order 14168” with Notice Number “NOT-OD-25-140.” Because the whistleblower reasonably fears retaliation, I am not disclosing their identity in connection with this filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 18th day of August 2025 at Olympia, Washington.

/s/ William McGinty

WILLIAM MCGINTY, WSBA #41868
Assistant Attorney General